

City of Auburn

As a local public agency that contracts with King County Department of Natural Resources for wastewater treatment and disposal, the City of Auburn Public Works Department is concerned about the proposed Nutrient General Permit for the following reasons:

- The costs of adding nutrient removal technologies could result in a 500% increase in future sewer rates, resulting in severe affordability and social equity issues.
- There is no certainty that the expensive addition of nutrient removal technologies will result in improved dissolved oxygen in shallow areas of Puget Sound, especially considering that 80-90% of the nutrients in Puget Sound come from natural sources (Pacific Ocean), non-point sources, and climate change.
- Before regulations are proposed, more field investigations are needed to verify the modeling and determine the effectiveness and costs impacts of adding new nutrient removal technologies at the region's wastewater treatment plants. There may be other actions that can achieve improved water quality at a lower cost.
- While Chapter 173-226-050 of the Washington Administrative Code gives Ecology the statutory authority to issue a General Permit for wastewater dischargers, it requires that the dischargers have similar types of operations and similar wastes. All of the treatment plants included in the proposed regulations have significant differences in treatment processes and available space to expand that must be considered in setting discharge requirements.
- The proposed regulations fail to consider alternatives that recognize the space limitations and highly variable flows that will make it virtually impossible to add nutrient removal technologies to King County's West Point Treatment Plant. A bubble permit or water quality trading are the only way that King County's three wastewater treatment plants could comply with the new regulations.
- The public process that began in Fall 2019 has been too rushed, especially given the Covid-19 pandemic. Other permits, such as the NPDES permit process and the Chesapeake Bay nutrient permit, took several years to develop, with numerous opportunities for public and agency engagement and collaboration. Ecology should extend the schedule to gather additional scientific input, explore alternative actions, and provide opportunities to collaborate to develop a regional plan supported by all stakeholders.